

EPA NO. W63325
FILE NO. P1-2



2164181 - R8 SDMS

U.S. EPA REGION VIII
HAZARDOUS WASTE MANAGEMENT DIVISION
RCRA COMPLIANCE INSPECTION REPORT

Facility Name: Chevron Chemical, now known as
FS Industries

EPA I.D. No: WYD151663325

Mailing address: P.O. Box 1928
Rock Springs, WY 82902

Location: 525 South Highway 430
Rock Springs, WY

Facility Contact: Jim Williams, Vice President of
Operations

Telephone: (307) 382-1400

Date of Inspection: June 25, 1992

Notification Status:

Type of Inspection: Compliance Evaluation Inspection
(CEI)

Participants: Mr. James Kiefer (U.S. EPA)
Mr. John Works (U.S. EPA)
Mr. Jim Williams, Chevron/FS Industries

Weather: Cloudy and raining

Time In: 12:15 PM

Time Out: 2:40 PM

INTRODUCTION

At approximately 12:15 PM on June 25, 1992, the inspectors arrived at the facility. The inspectors checked in with the secretary and met with Mr. Jim Williams, the facility's Vice President of Operations.

Mr. Kiefer presented his credentials to Mr. Williams and explained the purpose of the inspection. Mr. Kiefer explained that the inspection would include, a discussion on wastes generated by the facility, a tour of all waste management areas, including interviews with appropriate personnel, and a closing conference.

Mr. Kiefer said that the purpose of the Compliance Evaluation Inspection (CEI) was to determine compliance of the facility with the Resource Conservation and Recovery Act (RCRA). He said that the inspection would cover the last three years and all wastes generated at the facility. Mr. Kiefer filled out the top portion of the Notice of Inspection form and asked Mr. Williams to initial next to the check mark for entry by consent. Mr. Kiefer explained to Mr. Williams that he would give him a copy of the Notice of Inspection at the end of the inspection. The inspectors requested that Mr. Williams give a brief explanation of the facility and all points of waste generation.

Mr. Williams explained the facility to the inspectors and then showed them the waste management areas that had been discussed. After the inspection of the waste and process areas of the facility, Mr. Kiefer asked to review manifests and other required records and documents.

INSPECTION

Mr. Williams explained that on April 17, 1992 the facility was purchased from Chevron Chemical by FS Industries, Ltd.. J.R. Simplot owns 50% of the facility and the other 50% is owned by Farmland Industries. According to Mr. Williams, the Rock Springs facility produces phosphoric acid for animal feed and fertilizer. Phosphate rock is produced at a mine in Vernal, UT and delivered to this facility via a 96 mile pipeline. The final products are superphosphoric acid (70% P_2O_5) and monoammonium phosphate (50% P_2O_5 and 10% N_2). From the 80,000 tons of rock provided by the Vernal mine each year, 240,000 tons of P_2O_5 are produced.

The production process involves burning sulfur to produce sulfur dioxide and sulfur trioxide, then reacting it with water to yield H_2SO_4 . The H_2SO_4 reacts with the phosphate rock to produce weak phosphoric acid and gypsum salt crystals. These crystals are filtered out and disposed of in an impoundment which has a 50-60 mil polyethylene liner. The facility stacks the phosogypsum in an effort to reduce the water area by 40%. This reduction in

water area was requested by the state.

During the production process some silicon tetrafluoride gas is released. The facility is permitted for 2.6 lbs/hour by the state, but hopes they will be releasing no more than .7 lbs/hour of the silicon tetrafluoride since installing additional scrubbers. Sagebrush takes up fluoride and is then consumed by wildlife in the area of the facility.

Mr. Williams continued to explain that part of the phosphoric acid is concentrated to make superphosphoric acid and the rest is reacted with anhydrous ammonia to produce monoammonium phosphate. The ammonia arrives by railcar from the Farmland facility in Louisiana. Water for the slurry comes from wells at the Vernal mine. The facility has Green River water rights, but is not currently using them. At the conclusion of this discussion, Mr. Kiefer asked manifests and shipping papers for hazardous wastes and used oil. Mr. Williams said that his environmental coordinator, Darin Howe, was out for the day, and that he didn't know where they were. Mr. Kiefer then asked Mr. Williams if he could show the inspectors some of the waste management areas at the facility.

Mr. Jim St.Clair showed the inspectors the 3 maintenance shops. There were various Safety Kleen sinks, drums, and parts washers in use. Waste oil is sent for recycling. Painting at the facility is contracted out, so no paint waste is normally generated. Chevron Thinner 450, a mineral spirits solvent with a flash point of 102°F, is used to clean bearings. While the inspectors were looking at some of the drums, one maintenance worker was getting some solvent in a bucket. Mr. Works asked him what he normally did with the solvent after he used it. He told Mr. Works that he puts it into the use oil tank. The waste tank was located near the drums. It appeared to be about a 300 gallon tank with a funnel for pouring oil, etc. into it. The inspectors asked to see the large number of drums on the far side of the large building used to store fertilizer. Mr. Williams said that he didn't know what they were. On the way to look at these drums, a heavy rain began and rather than going to the area of the drums, Mr. Williams took the inspectors to the boiler area. where the burning of sulfur generates 55,000 lbs./hr. of steam pressure, which is converted to 7 megawatts of electricity. The boiler area did not appear to generate a significant amount of waste.

At this point, the inspectors decided to conclude the inspection because of the rain and the long drive to Salt Lake City. In the closing conference in Mr. Williams office, Mr. Kiefer told Mr. Williams that he be sending a letter which would be ask for copies of waste oil shipping papers, an inventory of the stored drums, and manifests from Safety Kleen. The inspectors departed the facility at 2:40 PM.

Recommendation: A follow-up inspection, possibly involving other media such as air, water and TSCA should be conducted to fully understand the facility and to determine its compliance with environmental laws.

<i>James M. Kiefer</i>	<i>8/15/92</i>	<i>John D. Weeks</i>	<i>8/15/92</i>
Signature	Date	Signature	Date

FCD:August 3, 1992:\data\wp\insrpts\chevron.ins

U.S. ENVIRONMENTAL PROTECTION AGENCY (REGION VIII)

999 18th St. Suite 500, Denver, CO 80202-2413

NOTICE OF INSPECTION

PROGRAM

<input checked="" type="checkbox"/> Resource Conservation and Recovery Act (RCRA) Public Law 94-580, as amended. <input type="checkbox"/> Toxic Substances Control Act (TSCA) Public Law 94-469, as amended. <input type="checkbox"/> Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) Public Law 92-516, as amended.							
Date 6/25/92	Inspector #	Daily Seq. 4	Hour IN: 12:15P OUT: 2:40P	CMO Fac.	Facility name FS INDUSTRIES	EPA I.D. # WYD151663325	
Fac. Func.	Invest. Type CEI	FATES Reason	RCRA: Gen. () Transp. () TSD ()		WAS CHEVRON CHEMICAL Street 525 So. HWY 430		
Facility Representative(s) Jim Williams				Title Vice Pres of Operations			
Phone # (307) - (382-1400)				City ROCK SPRINGS		State WY	Zip 82902
Reason for Inspection: Entry by Consent: <input checked="" type="checkbox"/> JW Warrant: () <input checked="" type="checkbox"/> To determine the extent of compliance with the above referenced law, which may require the collection of samples, documents, and/or photographs. <input type="checkbox"/> Other (Specify) _____ Violations of above referenced law are suspected from information or complaint. Yes () No ()							
Samples, Documents, and/or Photos collected (describe below)						Medium	Date to Lab
1.							
2.							
3.							
4.							
5.							
6.							
Samples requested and received by facility: () Yes () No If yes: () Duplicate. () Split. () Photos (To be received when processed.)							
This inspection has revealed the following probable violations of EPA laws or regulations. Inspection will be followed up with letter requesting information as discussed							
The facts established by this inspection will be reviewed by personnel in the EPA Regional Office. A final determination of your facility's compliance with EPA regulations will be made as a result of this review. The review may reveal additional violations.							
Receipt of this Notice of Inspection is acknowledged. James M. Williams (Signature of facility representative)				Signature of Lead Inspector James M. Williams Assisting Inspectors (EPA/Conf./State) John D. Wachs			